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October 22, 2021

**Via ECF**

The Honorable Michael A. Hammer,  
United States Magistrate Judge  
Martin Luther King, Jr. Federal Building  
And Courthouse, 2<sup>nd</sup> Floor  
50 Walnut Street  
Newark, New Jersey 07102

**Re: *Bianchi v. Samsung Electronics America, Inc. et al.***  
**Civil Action No.: 2:17-cv-01263-CCC-MF**

Dear Judge Hammer:

Along with Plaintiffs' counsel, Mitchell Breit, we provided a joint status report in furtherance of the Court's request of October 6, 2021. In that report, we indicated that as a result of a mediation with Judge Dennis Cavanaugh (Ret.), the parties have a settlement in principal and are working on final details necessary to consummate the settlement. In response, Your Honor forwarded a message about entering a 60-day Order on October 25, 2021. After reviewing the matter with Mr. Breit, the parties believe that entry of a 60-day Order at this time is premature. Additionally, Judge Cavanaugh has authorized me to let the Court know that he can address questions about the settlement and plans to talk with Your Honor early next week.

Respectfully,

*/s/ James J O'Hara*

JAMES J. O'HARA  
On behalf of Defendant,  
Samsung Electronics America, Inc.

Respectfully,

*/s/ Mitchell Breit*

MITCHELL BREIT  
On behalf of Plaintiffs

JJO/js

Cc: All counsel (w/encls.) (by ECF)